

Attorneys for Plaintiff Red Roof Inns, Inc.

JANE DOE, an individual,

) Case No. 1:25-cv-00026-JLT-BAM

Plaintiffs,

V.

WYNDHAM HOTEL & RESORTS, INC.; THANDI ENTERPRISES, L.L.C.; CAL TEX HOSPITALITY, L.L.C; METRO HOSPITALITY SERVICES, INC.; RED ROOF INNS, INC.; OCEANIC FRESNO, L.P.; VAGABOND INN CORPORATION; BOOTA SINGH CHAHIL, as an individual trustee of CHAHIL FAMILY TRUST; KULDIP KAUR CHAHIL, as an individual trustee of CHAHIL FAMILY TRUST; KANTILAL B. PATEL, as an individual trustee of PATEL K B & I K LIVING TRUST; INDIRABEN K. PATEL, as an individual trustee of PATEL K B & I K LIVING TRUST; MADHUBEN K. PATEL, an individual; JAGRATI D. BHAKTA, an individual; ROGER BHAKTA, an individual; and ROES 1-200, inclusive.

**STIPULATION TO FURTHER EXTEND  
TIME TO RESPOND TO THE COMPLAINT  
AND ~~PROPOSED~~ ORDER**

Defendants.

STIPULATION TO FURTHER EXTEND TIME TO RESPOND TO THE COMPLAINT

Case No. 1:25-cv-00026-JLT-BAM

Plaintiff Jane Doe (“Plaintiff”) and Defendant Red Roof Inns, Inc. (“Red Roof”) (collectively, with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

1. On January 7, 2025, Plaintiff filed a complaint captioned *Jane Doe v. Wyndham Hotel & Resorts, Inc., et al.*, Case No. 1:25-cv-00026-JLT-BAM in the Eastern District of California.

2. Red Roof was served with the complaint on January 16, 2025. Based on the date of service, Red Roof’s response to the complaint was due on February 6, 2025.

3. On February 4, 2025, the parties submitted a stipulation pursuant to Local Rule 144(a) extending Red Roof’s deadline to respond to the complaint by twenty-eight (28) days to March 6, 2025.

4. The parties have now agreed to an additional seven (7) day extension for Red Roof to respond to the complaint. The new response deadline will be March 13, 2025.

**WHEREFORE, IT IS HERBY STIPULATED AND AGREED** that Red Roof’s deadline to respond to Plaintiff’s complaint shall be extended, up to and including March 13, 2025.

Dated: March 5, 2025

Respectfully submitted,

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*Attorneys for Defendant Red Roof Inns, Inc.*

DATED: March 5, 2025

Singleton Schreiber, LLP

By: /s/ Katie Llamas (authorized on 3/5/25)

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**CERTIFICATE OF SERVICE**

This Certificate of Service is made in compliance with Local Rule 5.1.2 and Civ.R. 5(b). I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 515 South Flower Street, Forty-Second Floor, Los Angeles, CA 90071.

On the date indicated below, a true and correct copy of the foregoing **STIPULATION TO FURTHER EXTEND TIME TO RESPOND TO THE COMPLAINT AND [PROPOSED] ORDER** was filed with Court and served electronically and will be available for viewing and downloading from the Court's CM/ECF system:

The Notice of Electronic Case Filing automatically generated by the system and sent to all parties entitled to service under the Federal Rules of Civil Procedure and the Local Rules of the Central District of California who have consented to electronic service shall constitute service of the filed document to all such parties.

Executed on, March 5, 2025, at Los Angeles, CA.

I declare under penalty of perjury that I am employed in the office of a member admitted to practice before the District Court for the Eastern District of California and ECF registered in this Court at whose direction the service was made and that the foregoing is true and correct.

By /s/ Erika Ortiz  
Erika Ortiz

**ORDER**

Pursuant to the parties' stipulation (Doc. 42) and good cause appearing, Defendant Red Roof Inns, Inc.'s responsive pleading deadline is extended to **March 13, 2025**.

IT IS SO ORDERED.

Dated: **March 6, 2025**

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE